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**Regulatory Interface Meeting  
August 30, 1994  
EPA Conference Room  
712 Swift Avenue, Richland, WA**

B.M. Barnes	WHC	T3-04	376-3640
A.K. Crowell	DOE	S7-55	372-2349
G.C. Evans	ITH	H6-02	376-8939
B.L. Foley	DOE	A5-19	372-7087
D.E. Gilkeson	ITH	A5-56	372-0898
N.T. Hepner	Ecology	Dept of Ecology	736-3048
A. Hopkins	ITH	H4-97	372-9027
P.S. Innis	EPA	B5-01	376-4919
J. James	BHI	H4-79	375-9690
D.E. McKenney	WHC	N3-10	376-7779
O.C. Robertson	DOE	A5-19	373-6295
F.V. Roeck	ITH	H6-01	376-8819
R.S. Weeks	ITH	H6-02	376-4482
R.H. Wyer	BHI	H4-80	375-4666



## Proposed ERDF Down Sizing

Based on final waste volume projections, and budget constraints, the Bechtel Hanford, Inc. (BHI) team has been looking at reductions to the Environmental Restoration Disposal Facility (ERDF) project scope. While down-scoping has not been approved, some proposed changes and rationales were presented. Project W-296, the ERDF, would construct 2 of the original 10 cells as required by current waste volume projections of 737,000 cubic yards through the year 2000; additional cells would be required to accommodate the expected 630,000 cubic yards per year expected through the year 2018. At these volumes, a maximum of 70 containers per shift would not require an automated decontamination facility; a less elaborate facility would be provided. The grout facility would be eliminated; grout supply could be out-sourced. The railroad would be eliminated all together. To accommodate 12-14 million cubic yards over the life of the facility, the trench will be expanded.

## Regulatory Package

The regulatory package preparation is on schedule. Draft packages will be transmitted for U.S. Department of Energy (DOE) and regulator review on September 6, 1994. The package for Environmental Protection Agency (EPA) will be sent to the appropriate travel location to accommodate EPA assignments. The package for the Department of Ecology (Ecology) will be sent to the Kennewick office.

## Response to August 17, 1994 Regulator Letter

Owen Robertson, DOE-RL, stated that the response to the regulator subject letter addressed to Bauer and Hunter, dated August 17, 1994, should be completed this week. Letter content will indicate that DOE understands the position that the record of decision (ROD) cannot authorize the complete facility. It should also state that a method for including Resource

Conservation and Recovery Act (RCRA) waste in a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) landfill needs to be specified by the regulators. Lastly, the letter will state that the ERDF Proposed Plan will discuss the whole facility, not just the two cells; this is contrary to expectations that the Bauer letter requests.

#### **CERCLA and RCRA Issues**

During restructuring of the regulatory package, the method for placing RCRA waste in a CERCLA landfill came under question. One solution was redesignating RCRA waste sites as CERCLA waste sites. When BHI requested a status, EPA replied that redesignation of waste sites was not necessarily the solution that would be pursued.

Discussion of waste site redesignation brought out a number of issues regarding document preparation for operable unit (OU) authorization. Currently, the OUs are preparing CERCLA documentation in anticipation that the RCRA sites will be redesignated. When Ecology gets Hazardous and Solid Waste Amendment (HSWA) authority, however, it is questionable whether CERCLA documentation will be acceptable. Remediation decisions would be made under permit modifications. Because Ecology typically expects permit modifications, this could be problematic. While this is not a concern during the remedial investigation process, for authorization to occur, the type of paperwork expected needs to be synchronized with the preparation. Currently, the Hanford Facility RCRA Permit is issued and will become effective on September 28, 1994 unless the permit is appealed.